

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicant thanks the Examiner for carefully considering this application.

Disposition of Claims

Claims 1-23 are pending in this application. Claims 1, 11, 12, 22, and 23 are independent. The remaining claims depend, directly or indirectly, from claims 1 and 12.

Objections

The abstract has been amended in accordance with the Examiner's suggestions. Accordingly, withdrawal of this objection is respectfully requested.

Claim Amendments

Independent claims 1, 11, 12, 22, and 23 have been amended to clarify the scope of the invention. Specifically, independent claims 1, 11, 12, 22, and 23 have been amended to clarify that populating the object graph includes modifying the name of an object in the object graph using the casting rules. Support for this amendment may be found, for example, in paragraphs [0025] – [0029]. No new matter has been added by this amendment.

Rejections under 35 U.S.C. §102

Claims 1-2, 4-7, 12-13, and 15-18 stand rejected under 35 U.S.C. §102 as being anticipated by U.S. Patent Application Publication No. 2002/0029375 ("Mlynarczyk"). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

The invention as recited in amended independent claim 1 is directed to a method for dynamically casting an object graph. Specifically, the casting of the object graph includes creating an internal representation of the object graph, instantiating a cast object graph using the internal representation and a casting rule, and then populating the object graph with at least one object, where the name of the object is modified using the casting rule. An example of a casting rule is shown in Table 2 and an example of a cast object graph created using the aforementioned casting rule is shown in Figure 4.

Turning to the rejection, for anticipation under 35 U.S.C. § 102, the reference must teach every aspect of the claimed invention either explicitly or impliedly. Further, for a reference to anticipate the invention, “[t]he identical invention must be shown in as complete detail as is contained in the ...claim.” See MPEP §2131 citing *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The Applicant respectfully asserts that Mlynarczyk does not teach or suggest the invention as recited in the claims.

The invention as recited in amended independent claim 1 is directed to casting objects by changing the “name” of the object in accordance with a casting rule. In contrast, Mlynarczyk teaches invoking methods of objects in a remote system using proxies (See Mlynarczyk, Figure 4). Thus, as described in Mlynarczyk, calls from the client application to the remote object are forwarded to the appropriate smart proxy object residing in the client application. The smart proxy object, in turn, communicates with the remote object on the server to invoke remote object and perform the call. The result of invoking the remote object and performing the call is communicated back to the client application via the appropriate smart proxy object. Clearly, the process of using a smart proxy is not casting. With respect to casting, the only teaching of Mlynarczyk that even attempts to address casting is the brief reference to “horizontal casting” in paragraphs [0032] and [0050] – [0052]. The aforementioned portions of Mlynarczyk are

directed to well known casting techniques for casting objects from one object type to another. However, Mlynarczyk is silent with respect to modifying the name of an object using a casting rule. In fact, Mlynarczyk is silent with respect to modifying objects in any manner. In view of the above, Mlynarczyk does not teach or suggest all the limitations of amended independent claim 1. Thus, amended independent claim 1 is patentable over Mlynarczyk. Independent claim 12, as amended, is patentable over Mlynarczyk for at least the same reasons as amended independent claim 1. Dependent claims are allowable for at least the same reasons as their respective independent claims. In view of the above, withdrawal of this rejection is respectfully requested.

Rejections under 35 U.S.C. 103

Claims 3, 10-11, 14, and 21-23 stand rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk in view of U.S. Patent No. 6,125,400 ("Cohen"). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

To establish a *prima facie* case of obviousness "...the prior art reference (or references when combined) must teach or suggest all the claim limitations." (See MPEP §2143.03). Further, "all words in a claim must be considered in judging the patentability of that claim against the prior art." (See MPEP §2143.03). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations of amended independent claim 1 from which claims 3 and 10-11 depend, amended independent claim 12 from which dependent claims 14 and 21 depend, and amended independent claims 22 and 23.

As discussed above, Mlynarczyk fails to teach or suggest all the limitations of amended independent claims 1, 12, 22, and 23. Further, Cohen does not teach that which Mlynarczyk lacks. This is evidenced by the fact that Cohen is analogous art and is only relied upon to teach

“a variable usage specification” (See Office Action mailed February 18, 2005, p. 5-8). Accordingly, amended independent claims 1, 12, 22, and 23 are patentable over Mlynarczyk and Cohen. Dependent claims are patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claim 8 stands rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk in view of U.S. Patent No. 4,853,843 (“Ecklund”). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

To establish a *prima facie* case of obviousness “...the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (See MPEP §2143.03). Further, “all words in a claim must be considered in judging the patentability of that claim against the prior art.” (See MPEP §2143.03). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations of amended independent claim 1 from which claim 8 depends.

As discussed above, Mlynarczyk fails to teach or suggest all the limitations of amended independent claim 1. Further, Ecklund does not teach that which Mlynarczyk lacks. This is evidenced by the fact that Ecklund is only relied upon to teach “a suffix method” (See Office Action mailed February 18, 2005, p. 8). Accordingly, amended independent claim 1 is patentable over Mlynarczyk and Ecklund. Dependent claim 8 is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Claim 9 stands rejected under 35 U.S.C. §103 as being unpatentable over Mlynarczyk in view of U.S. Patent Application Publication No. 2002/0188950 (“Soloff”). To the extent that this rejection applies to the amended claims, the rejection is respectfully traversed.

To establish a *prima facie* case of obviousness “...the prior art reference (or references when combined) must teach or suggest all the claim limitations.” (See MPEP §2143.03).

Further, "all words in a claim must be considered in judging the patentability of that claim against the prior art." (*See* MPEP §2143.03). The Applicant respectfully asserts that the references, when combined, fail to teach or suggest all the claim limitations of amended independent claim 1 from which claim 9 depends.

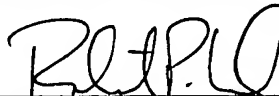
As discussed above, Mlynarczyk fails to teach or suggest all the limitations of amended independent claim 1. Further, Soloff does not teach that which Mlynarczyk lacks. This is evidenced by the fact that Soloff is only relied upon to teach "a parser method" (*See* Office Action mailed February 18, 2005, p. 9). Accordingly, amended independent claim 1 is patentable over Mlynarczyk and Soloff. Dependent claim 9 is patentable for at least the same reasons. Withdrawal of this rejection is respectfully requested.

Conclusion

Applicant believes this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 16159/020001).

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Respectfully submitted,

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